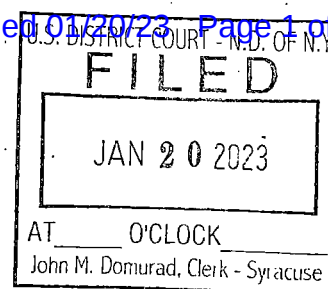


UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

Amanda Husted Plaintiff(s)

vs.

Lee Shibley Defendant(s)



Civil Case No.:

5:23-cv-79

(DNH/ATB)

CIVIL
RIGHTS
COMPLAINT
PURSUANT TO
42 U.S.C. § 1983

Plaintiff(s) demand(s) a trial by: ☒ JURY ☐ COURT (Select only one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4) and 2201.

PARTIES

2. Plaintiff: Amanda M. Husted
Address: 141 Elmwood Avenue
Syracuse, N.Y. 13207

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: Lee Shibley
Official Position: Landlord
Address: 113 Sunstroke
Syracuse, N.Y. 13206

b. Defendant: _____
Official Position: _____
Address: _____

c. Defendant: _____
Official Position: _____
Address: _____

Additional Defendants may be added on a separate sheet of paper.

4.

FACTS

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).

I rented a store front from Mr. Shibley for
(3) years/lease. Covid-19 hit the United States
and the Governor gave all tenants an extension
on rent and moving out. Before my lease was
even up, and without a Court Order, Mr.
Lee Shibley changed the locks, kept food cart
mobile unit, merchandise in store and rear shed.

5.

CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

We leased a storefront in March of 2017 for a (3) year term. My husband got incarcerated in November 2019 and Lee Shibley changed the locks on me, this was in February of 2020 before Our lease was up.

SECOND CAUSE OF ACTION

Mr. Shibley would not let me in the property and chose to keep all of Our merchandise and Mobile food unit, shed out back of the store and merchandise therein. He was being a bully to a woman.

THIRD CAUSE OF ACTION

After numerous attempts and phone calls, my husband called numerous times and Mr. Shibley said, "what do I get for storing it?" He would never let me get my things, even after Governor Hochul ordered an extension on rent and business leases. He has in his possession over 100,000.00 worth of merchandise, personal property, mobile food unit and shed with merchandise we had built from the ground up. As of November 2022, He still refuses to turnover Our merchandise and is using Our ADT.

6. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

I ask that we be given a trial date in front of a jury of our peers and that Mr. Shibley be made to pay 100,000. in property liability and he be held accountable for changing the locks without a Court Order.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 1/16/23

Amanda Husted

Signature of Plaintiff(s)
(all Plaintiffs must sign)

02/2010